

**Fair Political Practices Commission
Memorandum**

To: Chairman Johnson, Commissioners Hodson, Huguenin, Leidigh, & Remy

From: John W. Wallace, Assistant General Counsel
Scott Hallabrin, General Counsel

Subject: Work Plan Revisions for Second Quarter 2008

Date: March 25, 2008

Attached is the calendar reflecting proposed regulatory action for April, May, and June 2008. We will provide an additional update in June for the third quarter of the year, and final calendar in September for October, November, and December of 2008.

April	May	June
<p>Gift Cluster (Prenotice):</p> <ul style="list-style-type: none"> • Tickets to Non-profit Fundraisers: Regulation 18946.4. Revise rule for valuation of tickets to charitable fundraising events. • Valuation of Private Air Travel: Regulation 18946.6. Codify a single method of valuation of gifts of air travel. <p>Regulation 18413 - Multi-Purpose Non-Profit Corporations (Permanent Adoption): Staff proposes permanent adoption of Regulation 18413, adopted as an emergency regulation at the Commission's December 2007 meeting. The regulation specifies the registration and reporting obligations of multi-purpose non-profit corporations.</p> <p>ENFORCEMENT INFORMATIONAL SESSION</p>	<p>Gift Cluster (Adoption):</p> <ul style="list-style-type: none"> • 18944.2. Clarifying Amendments to the "Gift to Agency" Regulation. Regulation 18944.2 provides an exception to the gift limits and gift disclosure for certain payments made directly to public agencies. <p>Regulation 18421.7 and 18401 Use of Campaign Funds (Adoption):</p> <ul style="list-style-type: none"> • Raise the dollar threshold for recordkeeping. • Expand detailed reporting to in-state travel <p>Regulations 18360 and 18361 - Complaint Procedure/Delegation of Executive Director's Authority (Adoption): Staff proposes amendments to Regulation 18360, which governs the filing and processing of complaints alleging violations of the Political Reform Act, and Regulation 18361, expanding the Executive Director's delegation authority to duties under Regulation 18360.</p>	<p>Legal Defense Accounts: Local Officers (Prenotice): Implement Government Code Section 85304.5, which permits a local candidate to establish a legal defense fund, subject to certain restrictions.</p> <p>Gift Cluster (Adoption):</p> <ul style="list-style-type: none"> • Tickets to Non-profit Fundraisers: Regulation 18946.4. Revise rule for valuation of tickets to charitable fundraising events. • Valuation of Private Air Travel: Regulation 18946.6. Codify a single method of valuation of gifts of air travel. <p>Regulation Calendar. Update for the third quarter of the year.</p>

Below is a summary of other regulatory proposals planned for 2008. Depending on urgency and workload, staff may propose additional major regulatory action for the Commission to consider for this year and bring minor regulatory proposals to the Commission for its consideration. Staff will modify the list of future regulatory proposals on a quarterly basis.

- Member Communications – Consider amending Regulation 18531.7 and adding other regulations to define scope of member communications rules in Government Code Section 85312.
- Gift Regulations – Consider amending various Commission regulations on gifts to bring them into greater conformity with the Political Reform Act.
- “Primarily Formed Committee” – Define, for purposes of Government Code Section 82047.5, when a committee “exists primarily” to support or oppose candidates and measures.
- State, County and City General Purpose Committees – Define when a general purpose committee is a state, county or city committee.
- “Principal Officers” – Define who a committee’s “principal officers” are for purposes of Government Code Section 84102(c).
- Independent Expenditures – Consider new or amended regulations to address issues on independent expenditures discussed in the informational portion of the Commission’s February 2008 meeting.
- U.C. Hastings Regulation Project – Consider recommendations from the Center for State and Local Government Law at the University of California Hastings College of the Law on clarifying Commission regulations and bringing them into stylistic conformity.